

1 481. Defendants created, operated, aided, or abetted a trust with the purpose of fixing,
 2 controlling, or maintaining prices of Plasma-Derivative Protein Therapies in violation of Neb.
 3 Rev. St. §§ 59-801 *et seq.*, and Nebraska State Subclass members, accordingly, seek damages
 4 pursuant to Neb. Rev. St. § 59-831 and injunctive relief pursuant to Neb. Rev. St. § 59-814.

5 **N. Violation of the Nevada Unfair Trade Practice Act, N.R.S. §§ 598A.010 *et***
 6 **seq.**

7 482. As set forth herein, Defendants created, operated, aided, or abetted a trust,
 8 combine, or monopoly of Plasma-Derivative Protein Therapies by fixing, controlling, or
 9 maintaining prices in violation of the Nevada Unfair Trade Practice Act, N.R.S. §§ 598A.010 *et*
 10 *seq.* Defendants' unlawful conduct had the following effects: (1) the Plasma-Derivative Protein
 11 Therapies price competition and output were restrained, suppressed, and eliminated throughout
 12 Nevada; (2) the price of Plasma-Derivative Protein Therapies was raised, fixed, maintained, and
 13 stabilized at artificially high levels throughout Nevada; (3) Nevada State Subclass members
 14 were deprived of free and open competition; (4) Nevada State Subclass members relied on
 15 Defendants' false representation that the price of Plasma-Derivative Protein Therapies was a
 16 product of a free and fair market; and (5) Nevada State Subclass members paid
 17 supracompetitive, artificially inflated prices for Plasma-Derivative Protein Therapies.

18 483. Defendants conspired fix the prices of Plasma-Derivative Protein Therapies.
 19 Defendants agreed not to divulge the existence of the conspiracy, conducted meetings and
 20 conversations in secret, confined the plan to a small group of high-level officials, and avoided
 21 the creation of documents. United by their common interests, Defendants colluded to
 22 substantially limit, lessen, and exclude competition. Defendants reduced the production of
 23 Plasma-Derivative Protein Therapies, which prevented and restrained trade and commerce.
 24 With the ability to preclude free and unrestricted competition, Defendants increased the price of
 25 Plasma-Derivative Protein Therapies.

26 484. Nevada State Subclass members suffered an ascertainable loss of money or
 27 property from the supracompetitive, artificially inflated prices.

1 485. Defendants' conduct is a substantial factor of the Nevada State Subclass' loss.
 2 The loss was a direct and proximate result of Defendants' willful monopoly and price-fixing
 3 conspiracy. Nevada State Subclass members purchased Plasma-Derivative Protein Therapies at
 4 supracompetitive, artificially inflated prices because Defendants fixed prices after Defendants
 5 precluded free and unrestricted competition.

6 486. Defendants created, operated, aided, or abetted a trust with the purpose of fixing,
 7 controlling, or maintaining prices of Plasma-Derivative Protein Therapies in violation of the
 8 Nevada Unfair Trade Practice Act, N.R.S. §§ 598A.010 *et seq.*, and Nevada State Subclass
 9 members, accordingly, seek damages and injunctive relief pursuant to N.R.S. § 598A.210.

10 **O. Violation of the New Mexico Antitrust Act, N.M.S.A. §§ 57-1-1 *et seq.***

11 487. As set forth herein, Defendants created, operated, aided, or abetted a trust,
 12 combine, or monopoly of Plasma-Derivative Protein Therapies by fixing, controlling, or
 13 maintaining prices in violation of the New Mexico Antitrust Act, N.M.S.A. §§ 57-1-1 *et seq.*
 14 Defendants' unlawful conduct had the following effects: (1) the Plasma-Derivative Protein
 15 Therapies price competition and output were restrained, suppressed, and eliminated throughout
 16 New Mexico; (2) the price of Plasma-Derivative Protein Therapies was raised, fixed,
 17 maintained, and stabilized at artificially high levels throughout New Mexico; (3) New Mexico
 18 State Subclass members were deprived of free and open competition; (4) New Mexico State
 19 Subclass members relied on Defendants' false representation that the price of Plasma-Derivative
 20 Protein Therapies was a product of a free and fair market; and (5) New Mexico State Subclass
 21 members paid supracompetitive, artificially inflated prices for Plasma-Derivative Protein
 22 Therapies.

23 488. Defendants conspired fix the prices of Plasma-Derivative Protein Therapies.
 24 Defendants agreed not to divulge the existence of the conspiracy, conducted meetings and
 25 conversations in secret, confined the plan to a small group of high-level officials, and avoided
 26 the creation of documents. United by their common interests, Defendants colluded to
 27 substantially limit, lessen, and exclude competition. Defendants reduced the production of
 28 Plasma-Derivative Protein Therapies, which prevented and restrained trade and commerce.

1 With the ability to preclude free and unrestricted competition, Defendants increased the price of
 2 Plasma-Derivative Protein Therapies.

3 489. New Mexico State Subclass members suffered an ascertainable loss of money or
 4 property from the supracompetitive, artificially inflated prices.

5 490. Defendants' conduct is a substantial factor of the New Mexico State Subclass'
 6 loss. The loss was a direct and proximate result of Defendants' willful monopoly and price-
 7 fixing conspiracy. New Mexico State Subclass members purchased Plasma-Derivative Protein
 8 Therapies at supracompetitive, artificially inflated prices because Defendants fixed prices after
 9 Defendants precluded free and unrestricted competition.

10 491. Defendants created, operated, aided, or abetted a trust with the purpose of fixing,
 11 controlling, or maintaining prices of Plasma-Derivative Protein Therapies in violation of the
 12 New Mexico Antitrust Act, N.M.S.A. §§ 57-1-1 *et seq.*, and New Mexico State Subclass
 13 members, accordingly, seek damages and injunctive relief pursuant to N.M.S.A. § 57-1-3.

14 **P. Violation of New York Law, N.Y. Gen. Bus. Law §§ 340 *et seq.***

15 492. As set forth herein, Defendants created, operated, aided, or abetted a trust,
 16 combine, or monopoly of Plasma-Derivative Protein Therapies by fixing, controlling, or
 17 maintaining prices in violation of N.Y. Gen. Bus. Law §§ 340 *et seq.* Defendants' unlawful
 18 conduct had the following effects: (1) the Plasma-Derivative Protein Therapies price
 19 competition and output were restrained, suppressed, and eliminated throughout New York; (2)
 20 the price of Plasma-Derivative Protein Therapies was raised, fixed, maintained, and stabilized at
 21 artificially high levels throughout New York; (3) New York State Subclass members were
 22 deprived of free and open competition; (4) New York State Subclass members relied on
 23 Defendants' false representation that the price of Plasma-Derivative Protein Therapies was a
 24 product of a free and fair market; and (5) New York State Subclass members paid
 25 supracompetitive, artificially inflated prices for Plasma-Derivative Protein Therapies.

26 493. Defendants conspired to fix the prices of Plasma-Derivative Protein Therapies.
 27 Defendants agreed not to divulge the existence of the conspiracy, conducted meetings and
 28 conversations in secret, confined the plan to a small group of high-level officials, and avoided

1 the creation of documents. United by their common interests, Defendants colluded to
 2 substantially limit, lessen, and exclude competition. Defendants reduced the production of
 3 Plasma-Derivative Protein Therapies, which prevented and restrained trade and commerce.
 4 With the ability to preclude free and unrestricted competition, Defendants increased the price of
 5 Plasma-Derivative Protein Therapies.

6 494. New York State Subclass members suffered an ascertainable loss of money or
 7 property from the supracompetitive, artificially inflated prices.

8 495. Defendants' conduct is a substantial factor of the New York State Subclass' loss.
 9 The loss was a direct and proximate result of Defendants' willful monopoly and price-fixing
 10 conspiracy. New York State Subclass members purchased Plasma-Derivative Protein Therapies
 11 at supracompetitive, artificially inflated prices because Defendants fixed prices after Defendants
 12 precluded free and unrestricted competition.

13 496. Defendants created, operated, aided, or abetted a trust with the purpose of fixing,
 14 controlling, or maintaining prices of Plasma-Derivative Protein Therapies in violation of N.Y.
 15 Gen. Bus. Law §§ 340 *et seq.*, and New York State Subclass members, accordingly, seek
 16 damages and injunctive relief pursuant to N.Y. Gen. Bus. Law § 340.

17 **Q. Violation of North Carolina Law, N.C.G.S.A. §§ 75-1 *et seq.***

18 497. As set forth herein, Defendants created, operated, aided, or abetted a trust,
 19 combine, or monopoly of Plasma-Derivative Protein Therapies by fixing, controlling, or
 20 maintaining prices in violation of N.C.G.S.A. §§ 75-1 *et seq.* Defendants' unlawful conduct had
 21 the following effects: (1) the Plasma-Derivative Protein Therapies price competition and output
 22 were restrained, suppressed, and eliminated throughout North Carolina; (2) the price of
 23 Plasma-Derivative Protein Therapies was raised, fixed, maintained, and stabilized at artificially
 24 high levels throughout North Carolina; (3) North Carolina State Subclass members were
 25 deprived of free and open competition; (4) North Carolina State Subclass members relied on
 26 Defendants' false representation that the price of Plasma-Derivative Protein Therapies was a
 27 product of a free and fair market; and (5) North Carolina State Subclass members paid
 28 supracompetitive, artificially inflated prices for Plasma-Derivative Protein Therapies.

498. Defendants conspired to fix the prices of Plasma-Derivative Protein Therapies. Defendants agreed not to divulge the existence of the conspiracy, conducted meetings and conversations in secret, confined the plan to a small group of high-level officials, and avoided the creation of documents. United by their common interests, Defendants colluded to substantially limit, lessen, and exclude competition. Defendants reduced the production of Plasma-Derivative Protein Therapies, which prevented and restrained trade and commerce. With the ability to preclude free and unrestricted competition, Defendants increased the price of Plasma-Derivative Protein Therapies.

499. North Carolina State Subclass members suffered an ascertainable loss of money or property from the supracompetitive, artificially inflated prices.

500. Defendants' conduct is a substantial factor of the North Carolina State Subclass' loss. The loss was a direct and proximate result of Defendants' willful monopoly and price-fixing conspiracy. North Carolina State Subclass members purchased Plasma-Derivative Protein Therapies at supracompetitive, artificially inflated prices because Defendants fixed prices after Defendants precluded free and unrestricted competition.

501. Defendants created, operated, aided, or abetted a trust with the purpose of fixing, controlling, or maintaining prices of Plasma-Derivative Protein Therapies in violation of N.C.G.S.A. §§ 75-1 *et seq.*, and North Carolina State Subclass members, accordingly, seek damages pursuant to N.C.G.S.A. § 75-16 and injunctive relief pursuant to N.C.G.S.A. § 75-14.

R. Violation of North Dakota Law, NDCC §§ 51-08.1-01 *et seq.*

502. As set forth herein, Defendants created, operated, aided, or abetted a trust, combine, or monopoly of Plasma-Derivative Protein Therapies by fixing, controlling, or maintaining prices in violation of NDCC § 51-08.1- 01 *et seq.* Defendants' unlawful conduct had the following effects: (1) the Plasma-Derivative Protein Therapies price competition and output were restrained, suppressed, and eliminated throughout North Dakota; (2) the price of Plasma-Derivative Protein Therapies was raised, fixed, maintained, and stabilized at artificially high levels throughout North Dakota; (3) North Dakota State Subclass members were deprived of free and open competition; (4) North Dakota State Subclass members relied on Defendants'

1 false representation that the price of Plasma-Derivative Protein Therapies was a product of a
 2 free and fair market; and (5) North Dakota State Subclass members paid supracompetitive,
 3 artificially inflated prices for Plasma-Derivative Protein Therapies.

4 503. Defendants conspired fix the prices of Plasma-Derivative Protein Therapies.
 5 Defendants agreed not to divulge the existence of the conspiracy, conducted meetings and
 6 conversations in secret, confined the plan to a small group of high-level officials, and avoided
 7 the creation of documents. United by their common interests, Defendants colluded to
 8 substantially limit, lessen, and exclude competition. Defendants reduced the production of
 9 Plasma-Derivative Protein Therapies, which prevented and restrained trade and commerce.
 10 With the ability to preclude free and unrestricted competition, Defendants increased the price of
 11 Plasma-Derivative Protein Therapies.

12 504. North Dakota State Subclass members suffered an ascertainable loss of money or
 13 property from the supracompetitive, artificially inflated prices.

14 505. Defendants' conduct is a substantial factor of the North Dakota State Subclass'
 15 loss. The loss was a direct and proximate result of Defendants' willful monopoly and price-
 16 fixing conspiracy. North Dakota State Subclass members purchased Plasma-Derivative Protein
 17 Therapies at supracompetitive, artificially inflated prices because Defendants fixed prices after
 18 Defendants precluded free and unrestricted competition.

19 506. Defendants created, operated, aided, or abetted a trust with the purpose of fixing,
 20 controlling, or maintaining prices of Plasma-Derivative Protein Therapies in violation of NDCC
 21 §§ 51-08.1-01 *et seq.*, and North Dakota State Subclass members, accordingly, seek damages
 22 and injunctive relief pursuant to NDCC § 51-08.1-08.

23 **S. Violation of Oregon Law, O.R.S. §§ 646.705 *et seq.***

24 507. As set forth herein, Defendants created, operated, aided, or abetted a trust,
 25 combine, or monopoly of Plasma-Derivative Protein Therapies by fixing, controlling, or
 26 maintaining prices in violation of O.R.S. §§ 646.705 *et seq.* Defendants' unlawful conduct had
 27 the following effects: (1) the Plasma-Derivative Protein Therapies price competition and output
 28 were restrained, suppressed, and eliminated throughout Oregon; (2) the price of

1 Plasma-Derivative Protein Therapies was raised, fixed, maintained, and stabilized at artificially
2 high levels throughout Oregon; (3) Oregon State Subclass members were deprived of free and
3 open competition; (4) Oregon State Subclass members relied on Defendants' false
4 representation that the price of Plasma-Derivative Protein Therapies was a product of a free and
5 fair market; and (5) Oregon State Subclass members paid supracompetitive, artificially inflated
6 prices for Plasma-Derivative Protein Therapies.

7 508. Defendants conspired to fix the prices of Plasma-Derivative Protein Therapies.
8 Defendants agreed not to divulge the existence of the conspiracy, conducted meetings and
9 conversations in secret, confined the plan to a small group of high-level officials, and avoided
10 the creation of documents. United by their common interests, Defendants colluded to
11 substantially limit, lessen, and exclude competition. Defendants reduced the production of
12 Plasma-Derivative Protein Therapies, which prevented and restrained trade and commerce.
13 With the ability to preclude free and unrestricted competition, Defendants increased the price of
14 Plasma-Derivative Protein Therapies.

15 509. Oregon State Subclass members suffered an ascertainable loss of money or
16 property from the supracompetitive, artificially inflated prices.

17 510. Defendants' conduct is a substantial factor of the Oregon State Subclass' loss.
18 The loss was a direct and proximate result of Defendants' willful monopoly and price-fixing
19 conspiracy. Oregon State Subclass members purchased Plasma-Derivative Protein Therapies at
20 supracompetitive, artificially inflated prices because Defendants fixed prices after Defendants
21 precluded free and unrestricted competition.

22 511. Defendants created, operated, aided, or abetted a trust with the purpose of fixing,
23 controlling, or maintaining prices of Plasma-Derivative Protein Therapies in violation of O.R.S.
24 §§ 646.705 *et seq.*, and Oregon State Subclass members, accordingly, seek damages and
25 injunctive relief pursuant to O.R.S. § 646.780.

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1 **T. Violation of South Dakota Law, SDCL §§ 37-1-3.1 et seq.**

2 512. As set forth herein, Defendants created, operated, aided, or abetted a trust,
 3 combine, or monopoly of Plasma-Derivative Protein Therapies by fixing, controlling, or
 4 maintaining prices in violation of SDCL §§ 37-1-3.1 *et seq.* Defendants' unlawful conduct had
 5 the following effects: (1) the Plasma-Derivative Protein Therapies price competition and output
 6 were restrained, suppressed, and eliminated throughout South Dakota; (2) the price of
 7 Plasma-Derivative Protein Therapies was raised, fixed, maintained, and stabilized at artificially
 8 high levels throughout South Dakota; (3) South Dakota State Subclass members were deprived
 9 of free and open competition; (4) South Dakota State Subclass members relied on Defendants'
 10 false representation that the price of Plasma-Derivative Protein Therapies was a product of a
 11 free and fair market; and (5) South Dakota State Subclass members paid supracompetitive,
 12 artificially inflated prices for Plasma-Derivative Protein Therapies.

13 513. Defendants conspired to fix the prices of Plasma-Derivative Protein Therapies.
 14 Defendants agreed not to divulge the existence of the conspiracy, conducted meetings and
 15 conversations in secret, confined the plan to a small group of high-level officials, and avoided
 16 the creation of documents. United by their common interests, Defendants colluded to
 17 substantially limit, lessen, and exclude competition. Defendants reduced the production of
 18 Plasma-Derivative Protein Therapies, which prevented and restrained trade and commerce.
 19 With the ability to preclude free and unrestricted competition, Defendants increased the price of
 20 Plasma-Derivative Protein Therapies.

21 514. South Dakota State Subclass members suffered an ascertainable loss of money or
 22 property from the supracompetitive, artificially inflated prices.

23 515. Defendants' conduct is a substantial factor of the South Dakota State Subclass'
 24 loss. The loss was a direct and proximate result of Defendants' willful monopoly and price-
 25 fixing conspiracy. South Dakota State Subclass members purchased Plasma-Derivative Protein
 26 Therapies at supracompetitive, artificially inflated prices because Defendants fixed prices after
 27 Defendants precluded free and unrestricted competition.

1 516. Defendants created, operated, aided, or abetted a trust with the purpose of fixing,
2 controlling, or maintaining prices of Plasma-Derivative Protein Therapies in violation of SDCL
3 §§ 37-1-3.1 *et seq.*, and South Dakota State Subclass members, accordingly, seek damages and
4 injunctive relief pursuant to SDCL § 37-1-14.3.

5 **U. Violation of the Utah Antitrust Act, U.C.A. §§ 76-10-911 *et seq.***

6 517. As set forth herein, Defendants created, operated, aided, or abetted a trust,
7 combine, or monopoly of Plasma-Derivative Protein Therapies by fixing, controlling, or
8 maintaining prices in violation of the Utah Antitrust Act, U.C.A. §§ 76-10-911 *et seq.*
9 Defendants' unlawful conduct had the following effects: (1) the Plasma-Derivative Protein
10 Therapies price competition and output were restrained, suppressed, and eliminated throughout
11 Utah; (2) the price of Plasma-Derivative Protein Therapies was raised, fixed, maintained, and
12 stabilized at artificially high levels throughout Utah; (3) Utah State Subclass members were
13 deprived of free and open competition; (4) Utah State Subclass members relied on Defendants'
14 false representation that the price of Plasma-Derivative Protein Therapies was a product of a
15 free and fair market; and (5) Utah State Subclass members paid supracompetitive, artificially
16 inflated prices for Plasma-Derivative Protein Therapies.

17 518. Defendants conspired to fix the prices of Plasma-Derivative Protein Therapies.
18 Defendants agreed not to divulge the existence of the conspiracy, conducted meetings and
19 conversations in secret, confined the plan to a small group of high-level officials, and avoided
20 the creation of documents. United by their common interests, Defendants colluded to
21 substantially limit, lessen, and exclude competition. Defendants reduced the production of
22 Plasma-Derivative Protein Therapies, which prevented and restrained trade and commerce.
23 With the ability to preclude free and unrestricted competition, Defendants increased the price of
24 Plasma-Derivative Protein Therapies.

25 519. Utah State Subclass members suffered an ascertainable loss of money or property
26 from the supracompetitive, artificially inflated prices.

520. Defendants conduct is a substantial factor of the Utah State Subclass' loss. The loss was a direct and proximate result of Defendants' willful monopoly and price-fixing conspiracy. Utah State Subclass members purchased Plasma-Derivative Protein Therapies at supracompetitive, artificially inflated prices because Defendants fixed prices after Defendants precluded free and unrestricted competition.

521. Defendants created, operated, aided, or abetted a trust with the purpose of fixing, controlling, or maintaining prices of Plasma-Derivative Protein Therapies in violation of the Utah Antitrust Act, U.C.A. §§ 76-10-911 *et seq.*, and Utah State Subclass members, accordingly, seek damages and injunctive relief pursuant to U.C.A. § 76-10-919.

V. Violation of Vermont Law, 9 V.S.A. §§ 2451 *et seq.*

522. As set forth herein, Defendants created, operated, aided, or abetted a trust, combine, or monopoly of Plasma-Derivative Protein Therapies by fixing, controlling, or maintaining prices in violation of 9 V.S.A. §§ 2451 *et seq.* Defendants' unlawful conduct had the following effects: (1) the Plasma-Derivative Protein Therapies price competition and output were restrained, suppressed, and eliminated throughout Vermont; (2) the price of Plasma-Derivative Protein Therapies was raised, fixed, maintained, and stabilized at artificially high levels throughout Vermont; (3) Vermont State Subclass members were deprived of free and open competition; (4) Vermont State Subclass members relied on Defendants' false representation that the price of Plasma-Derivative Protein Therapies was a product of a free and fair market; and (5) Vermont State Subclass members paid supracompetitive, artificially inflated prices for Plasma-Derivative Protein Therapies.

523. Defendants conspired to fix the prices of Plasma-Derivative Protein Therapies. Defendants agreed not to divulge the existence of the conspiracy, conducted meetings and conversations in secret, confined the plan to a small group of high-level officials, and avoided the creation of documents. United by their common interests, Defendants colluded to substantially limit, lessen, and exclude competition. Defendants reduced the production of Plasma-Derivative Protein Therapies, which prevented and restrained trade and commerce.

1 With the ability to preclude free and unrestricted competition, Defendants increased the price of
2 Plasma-Derivative Protein Therapies.

3 524. Vermont State Subclass members suffered an ascertainable loss of money or
4 property from the supracompetitive, artificially inflated prices.

5 525. Defendants' conduct is a substantial factor of the Vermont State Subclass' loss.
6 The loss was a direct and proximate result of Defendants' willful monopoly and price-fixing
7 conspiracy. Vermont State Subclass members purchased Plasma-Derivative Protein Therapies
8 at supracompetitive, artificially inflated prices because Defendants fixed prices after Defendants
9 precluded free and unrestricted competition.

10 526. Defendants created, operated, aided, or abetted a trust with the purpose of fixing,
11 controlling, or maintaining prices of Plasma-Derivative Protein Therapies in violation of 9
12 V.S.A. §§ 2451 *et seq.*, and Vermont State Subclass members, accordingly, seek damages
13 pursuant to 9 V.S.A. § 2465.

14 **W. Violation of the West Virginia Antitrust Act, W. Va. Code §§ 47-18-1 *et seq.***

15 527. As set forth herein, Defendants created, operated, aided, or abetted a trust,
16 combine, or monopoly of Plasma-Derivative Protein Therapies by fixing, controlling, or
17 maintaining prices in violation of the West Virginia Antitrust Act, W. Va. Code §§ 47-18-1 *et*
18 *seq.* Defendants' unlawful conduct had the following effects: (1) the Plasma-Derivative Protein
19 Therapies price competition and output were restrained, suppressed, and eliminated throughout
20 West Virginia; (2) the price of Plasma-Derivative Protein Therapies was raised, fixed,
21 maintained, and stabilized at artificially high levels throughout West Virginia; (3) West Virginia
22 State Subclass members were deprived of free and open competition; (4) West Virginia State
23 Subclass members relied on Defendants' false representation that the price of Plasma-Derivative
24 Protein Therapies was a product of a free and fair market; and (5) West Virginia State Subclass
25 members paid supracompetitive, artificially inflated prices for Plasma-Derivative Protein
26 Therapies.

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528. Defendants conspired to fix the prices of Plasma-Derivative Protein Therapies. Defendants agreed not to divulge the existence of the conspiracy, conducted meetings and conversations in secret, confined the plan to a small group of high-level officials, and avoided the creation of documents. United by their common interests, Defendants colluded to substantially limit, lessen, and exclude competition. Defendants reduced the production of Plasma-Derivative Protein Therapies, which prevented and restrained trade and commerce. With the ability to preclude free and unrestricted competition, Defendants increased the price of Plasma-Derivative Protein Therapies.

529. West Virginia State Subclass members suffered an ascertainable loss of money or property from the supracompetitive, artificially inflated prices.

530. Defendants' conduct is a substantial factor of the West Virginia State Subclass' loss. The loss was a direct and proximate result of Defendants' willful monopoly and price-fixing conspiracy. West Virginia State Subclass members purchased Plasma-Derivative Protein Therapies at supracompetitive, artificially inflated prices because Defendants fixed prices after Defendants precluded free and unrestricted competition.

531. Defendants created, operated, aided, or abetted a trust with the purpose of fixing, controlling, or maintaining prices of Plasma-Derivative Protein Therapies in violation of the West Virginia Antitrust Act, W. Va. Code §§ 47-18-1 *et seq.*, and West Virginia State Subclass members, accordingly, seek damages pursuant to W. Va. Code § 47-18-9 and injunctive relief pursuant to W. Va. Code § 47-18-8.

X. Violation of Wisconsin Law, W.S.A. §§ 133.01 *et seq.*

532. As set forth herein, Defendants created, operated, aided, or abetted a trust, combine, or monopoly of Plasma-Derivative Protein Therapies by fixing, controlling, or maintaining prices in violation of W.S.A. §§ 133.01 *et seq.* Defendants' unlawful conduct had the following effects: (1) the Plasma-Derivative Protein Therapies price competition and output were restrained, suppressed, and eliminated throughout Wisconsin; (2) the price of Plasma-Derivative Protein Therapies was raised, fixed, maintained, and stabilized at artificially high levels throughout Wisconsin; (3) Wisconsin State Subclass members were deprived of free

1 and open competition; (4) Wisconsin State Subclass members relied on Defendants' false
 2 representation that the price of Plasma-Derivative Protein Therapies was a product of a free and
 3 fair market; and (5) Wisconsin State Subclass members paid supracompetitive, artificially
 4 inflated prices for Plasma-Derivative Protein Therapies.

5 533. Defendants conspired to fix the prices of Plasma-Derivative Protein Therapies.
 6 Defendants agreed not to divulge the existence of the conspiracy, conducted meetings and
 7 conversations in secret, confined the plan to a small group of high-level officials, and avoided
 8 the creation of documents. United by their common interests, Defendants colluded to
 9 substantially limit, lessen, and exclude competition. Defendants reduced the production of
 10 Plasma-Derivative Protein Therapies, which prevented and restrained trade and commerce.
 11 With the ability to preclude free and unrestricted competition, Defendants increased the price of
 12 Plasma-Derivative Protein Therapies.

13 534. Wisconsin State Subclass members suffered an ascertainable loss of money or
 14 property from the supracompetitive, artificially inflated prices.

15 535. Defendants' conduct is a substantial factor of the Wisconsin State Subclass' loss.
 16 The loss was a direct and proximate result of Defendants' willful monopoly and price-fixing
 17 conspiracy. Wisconsin State Subclass members purchased Plasma-Derivative Protein Therapies
 18 at supracompetitive, artificially inflated prices because Defendants fixed prices after Defendants
 19 precluded free and unrestricted competition.

20 536. Defendants created, operated, aided, or abetted a trust with the purpose of fixing,
 21 controlling, or maintaining prices of Plasma-Derivative Protein Therapies in violation of
 22 W.S.A. §§ 133.01 *et seq.*, and Wisconsin State Subclass members, accordingly, seek damages
 23 pursuant to W.S.A. § 133.018 and injunctive relief pursuant to W.S.A. § 133.016.

24 **Y. Violation of Wyoming Law, W.S. §§ 40-4-101 *et seq.***

25 537. As set forth herein, Defendants created, operated, aided, or abetted a trust,
 26 combine, or monopoly of Plasma-Derivative Protein Therapies by fixing, controlling, or
 27 maintaining prices in violation of W.S. §§ 40-4-101 *et seq.* Defendants' unlawful conduct had
 28 the following effects: (1) the Plasma-Derivative Protein Therapies price competition and output

1 were restrained, suppressed, and eliminated throughout Wyoming; (2) the price of
 2 Plasma-Derivative Protein Therapies was raised, fixed, maintained, and stabilized at artificially
 3 high levels throughout Wyoming; (3) Wyoming State Subclass members were deprived of free
 4 and open competition; (4) Wyoming State Subclass members relied on Defendants' false
 5 representation that the price of Plasma-Derivative Protein Therapies was a product of a free and
 6 fair market; and (5) Wyoming State Subclass members paid supracompetitive, artificially
 7 inflated prices for Plasma-Derivative Protein Therapies.

8 538. Defendants conspired to fix the prices of Plasma-Derivative Protein Therapies.
 9 Defendants agreed not to divulge the existence of the conspiracy, conducted meetings and
 10 conversations in secret, confined the plan to a small group of high-level officials, and avoided
 11 the creation of documents. United by their common interests, Defendants colluded to
 12 substantially limit, lessen, and exclude competition. Defendants reduced the production of
 13 Plasma-Derivative Protein Therapies, which prevented and restrained trade and commerce.
 14 With the ability to preclude free and unrestricted competition, Defendants increased the price of
 15 Plasma-Derivative Protein Therapies.

16 539. Wyoming State Subclass members suffered an ascertainable loss of money or
 17 property from the supracompetitive, artificially inflated prices.

18 540. Defendants' conduct is a substantial factor of the Wyoming State Subclass' loss.
 19 The loss was a direct and proximate result of Defendants' willful monopoly and price-fixing
 20 conspiracy. Wyoming State Subclass members purchased Plasma-Derivative Protein Therapies
 21 at supracompetitive, artificially inflated prices because Defendants fixed prices after Defendants
 22 precluded free and unrestricted competition.

23 541. Defendants created, operated, aided, or abetted a trust with the purpose of fixing,
 24 controlling, or maintaining prices of Plasma-Derivative Protein Therapies in violation of W.S.
 25 §§ 40-4-101 *et seq.*, and Wyoming State Subclass members, accordingly, seek damages and
 26 injunctive relief pursuant to W.S. § 40-4-114.

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THIRD CLAIM FOR RELIEF

(VIOLATION OF STATE UNFAIR COMPETITION LAWS)

542. Plaintiff incorporates and re-alleges, as though fully set forth herein, each and every allegation set forth in the preceding paragraphs of this Complaint.

543. Defendants engaged in unfair methods of competition or unconscionable, unfair, or deceptive acts or practices in violation of the state unfair competition statutes listed below.

A. Violation of the Colorado Consumer Protection Act, C.R.S. §§ 6-1-101 et seq.

544. As set forth herein, Defendants engaged in unfair methods of competition or unconscionable, unfair, or deceptive acts or practices in violation of the Colorado Consumer Protection Act, C.R.S. §§ 6-1-101 et seq. Defendants' unlawful conduct had the following effects: (1) the Plasma-Derivative Protein Therapies price competition and output were restrained, suppressed, and eliminated throughout Colorado; (2) the price of Plasma-Derivative Protein Therapies was raised, fixed, maintained, and stabilized at artificially high levels throughout Colorado; (3) Colorado State Subclass members were deprived of free and open competition; (4) Colorado State Subclass members relied on Defendants' false representation that the price of Plasma-Derivative Protein Therapies was a product of a free and fair market; and (5) Colorado State Subclass members paid supracompetitive, artificially inflated prices for Plasma-Derivative Protein Therapies.

545. Defendants knowingly and willfully engaged in deceptive and unconscionable conduct by creating and participating in a price-fixing conspiracy. Defendants knowingly misrepresented the quantities of Plasma-Derivative Protein Therapies and justifications for price increases. Defendants, also, knowingly failed to disclose material information and important facts regarding the cost of Plasma-Derivative Protein Therapies. Defendants knowingly misled Colorado State Subclass members by creating the illusion of competitive pricing controlled by market forces, rather than Defendants' illegal conspiracy. Defendants deceptively concealed their unlawful activities by agreeing not to divulge the existence of the conspiracy, conducting meetings and conversations in secret, confining the plan to a small group of high-level officials, and avoiding the creation of documents.

546. Defendants engaged in deceptive and unconscionable conduct to secure economic benefits from Colorado State Subclass members. Colorado State Subclass members were not aware of Defendants' price-fixing conspiracy or that they were being unfairly and illegally overcharged. There was a gross disparity of bargaining power between the parties with respect to the price of Plasma-Derivative Protein Therapies. Defendants had the sole power to set that price and Colorado State Subclass members had no power to negotiate. Defendants' fraudulent actions, therefore, suppressed competition, which resulted in unconscionably higher prices for purchasers and increased benefits for Defendants.

547. Colorado State Subclass members suffered an ascertainable loss of money or property from the supracompetitive, artificially inflated prices.

548. Defendants' conduct is a substantial factor of the Colorado State Subclass' loss. The loss was a direct and proximate result of Defendants' willful and deceptive conduct. Colorado State Subclass members purchased Plasma-Derivative Protein Therapies at supracompetitive, artificially inflated prices because they reasonably relied on the false pretense, which Defendants created, that the price was a product of a free and fair market.

549. Defendants engaged in unfair methods of competition or unconscionable, unfair, or deceptive acts or practices in violation of the Colorado Consumer Protection Act, C.R.S. §§ 6-1-101, *et seq.*, and Colorado State Subclass members, accordingly, seek damages pursuant to C.R.S. § 6-1-113.

B. Violation of District of Columbia Law, DC Code §§ 28-3901 *et seq.*

550. As set forth herein, Defendants engaged in unfair methods of competition or unconscionable, unfair, or deceptive acts or practices in violation of DC Code §§ 28-3901 *et seq.* Defendants' unlawful conduct had the following effects: (1) the Plasma-Derivative Protein Therapies price competition and output were restrained, suppressed, and eliminated throughout the District of Columbia; (2) the price of Plasma-Derivative Protein Therapies was raised, fixed, maintained, and stabilized at artificially high levels throughout the District of Columbia; (3) District of Columbia Subclass members were deprived of free and open competition; (4) District of Columbia Subclass members relied on Defendants' false representation that the price of

1 Plasma-Derivative Protein Therapies was a product of a free and fair market; and (5) District of
2 Columbia Subclass members paid supracompetitive, artificially inflated prices for
3 Plasma-Derivative Protein Therapies.

4 551. Defendants knowingly and willfully engaged in deceptive and unconscionable
5 conduct by creating and participating in a price-fixing conspiracy. Defendants knowingly
6 misrepresented the quantities of Plasma-Derivative Protein Therapies and justifications for price
7 increases. Defendants, also, knowingly failed to disclose material information and important
8 facts regarding the cost of Plasma-Derivative Protein Therapies. Defendants knowingly misled
9 District of Columbia Subclass members by creating the illusion of competitive pricing
10 controlled by market forces, rather than Defendants' illegal conspiracy. Defendants deceptively
11 concealed their unlawful activities by agreeing not to divulge the existence of the conspiracy,
12 conducting meetings and conversations in secret, confining the plan to a small group of
13 high-level officials, and avoiding the creation of documents.

14 552. Defendants engaged in deceptive and unconscionable conduct to secure
15 economic benefits from District of Columbia Subclass members. District of Columbia Subclass
16 members were not aware of Defendants' price-fixing conspiracy or that they were being unfairly
17 and illegally overcharged. There was a gross disparity of bargaining power between the parties
18 with respect to the price of Plasma-Derivative Protein Therapies. Defendants had the sole
19 power to set that price and District of Columbia Subclass members had no power to negotiate.
20 Defendants' fraudulent actions, therefore, suppressed competition, which resulted in
21 unconscionably higher prices for purchasers and increased benefits for Defendants.

22 553. District of Columbia Subclass members suffered an ascertainable loss of money
23 or property from the supracompetitive, artificially inflated prices.

24 554. Defendants' conduct is a substantial factor of the District of Columbia Subclass'
25 loss. The loss was a direct and proximate result of Defendants' willful and deceptive conduct.
26 District of Columbia Subclass members purchased Plasma-Derivative Protein Therapies at
27 supracompetitive, artificially inflated prices because they reasonably relied on the false pretense,
28 which Defendants created, that the price was a product of a free and fair market.

1 555. Defendants engaged in unfair methods of competition or unconscionable, unfair,
2 or deceptive acts or practices in violation of DC Code §§ 28-3901, *et seq.*, and District of
3 Columbia Subclass members, accordingly, seek damages and injunctive relief pursuant to DC
4 Code § 28-3905.

5 **C. Violation of the Florida Deceptive & Unfair Trade Practices Act, F.S.A. §§ 501.201**
6 **et seq.**

7 556. As set forth herein, Defendants engaged in unfair methods of competition or
8 unconscionable, unfair, or deceptive acts or practices in violation of the Florida Deceptive &
9 Unfair Trade Practices Act, F.S.A. §§ 501.201 *et seq.* Defendants' unlawful conduct had the
10 following effects: (1) the Plasma-Derivative Protein Therapies price competition and output
11 were restrained, suppressed, and eliminated throughout Florida; (2) the price of
12 Plasma-Derivative Protein Therapies was raised, fixed, maintained, and stabilized at artificially
13 high levels throughout Florida; (3) Florida State Subclass members were deprived of free and
14 open competition; (4) Florida State Subclass members relied on Defendants' false representation
15 that the price of Plasma-Derivative Protein Therapies was a product of a free and fair market;
16 and (5) Florida State Subclass members paid supracompetitive, artificially inflated prices for
17 Plasma-Derivative Protein Therapies.

18 557. Defendants knowingly and willfully engaged in deceptive and unconscionable
19 conduct by creating and participating in a price-fixing conspiracy. Defendants knowingly
20 misrepresented the quantities of Plasma-Derivative Protein Therapies and justifications for price
21 increases. Defendants, also, knowingly failed to disclose material information and important
22 facts regarding the cost of Plasma-Derivative Protein Therapies. Defendants knowingly misled
23 Florida State Subclass members by creating the illusion of competitive pricing controlled by
24 market forces, rather than Defendants' illegal conspiracy. Defendants deceptively concealed
25 their unlawful activities by agreeing not to divulge the existence of the conspiracy, conducting
26 meetings and conversations in secret, confining the plan to a small group of high-level officials,
27 and avoiding the creation of documents.

558. Defendants engaged in deceptive and unconscionable conduct to secure economic benefits from Florida State Subclass members. Florida State Subclass members were not aware of Defendants' price-fixing conspiracy or that they were being unfairly and illegally overcharged. There was a gross disparity of bargaining power between the parties with respect to the price of Plasma-Derivative Protein Therapies. Defendants had the sole power to set that price and Florida State Subclass members had no power to negotiate. Defendants' fraudulent actions, therefore, suppressed competition, which resulted in unconscionably higher prices for purchasers and increased benefits for Defendants.

559. Florida State Subclass members suffered an ascertainable loss of money or property from the supracompetitive, artificially inflated prices.

560. Defendants' conduct is a substantial factor of the Florida State Subclass' loss. The loss was a direct and proximate result of Defendants' willful and deceptive conduct. Florida State Subclass members purchased Plasma-Derivative Protein Therapies at supracompetitive, artificially inflated prices because they reasonably relied on the false pretense, which Defendants created, that the price was a product of a free and fair market.

561. Defendants engaged in unfair methods of competition or unconscionable, unfair, or deceptive acts or practices in violation of the Florida Deceptive & Unfair Trade Practices Act, F.S.A. §§ 501.201, *et seq.*, and Florida State Subclass members, accordingly, seek damages and injunctive relief pursuant to F.S.A. § 501.211.

D. Violation of Illinois Law, 815 ILCS 505/1 *et seq.*

562. As set forth herein, Defendants engaged in unfair methods of competition or unconscionable, unfair, or deceptive acts or practices in violation of 815 ILCS 505/1 *et seq.* Defendants' unlawful conduct had the following effects: (1) the Plasma-Derivative Protein Therapies price competition and output were restrained, suppressed, and eliminated throughout Illinois; (2) the price of Plasma-Derivative Protein Therapies was raised, fixed, maintained, and stabilized at artificially high levels throughout Illinois; (3) Illinois State Subclass members were deprived of free and open competition; (4) Illinois State Subclass members relied on Defendants' false representation that the price of Plasma-Derivative Protein Therapies was a

1 product of a free and fair market; and (5) Illinois State Subclass members paid
2 supracompetitive, artificially inflated prices for Plasma-Derivative Protein Therapies.

3 563. Defendants knowingly and willfully engaged in deceptive and unconscionable
4 conduct by creating and participating in a price-fixing conspiracy. Defendants knowingly
5 misrepresented the quantities of Plasma-Derivative Protein Therapies and justifications for price
6 increases. Defendants, also, knowingly failed to disclose material information and important
7 facts regarding the cost of Plasma-Derivative Protein Therapies. Defendants knowingly misled
8 Illinois State Subclass members by creating the illusion of competitive pricing controlled by
9 market forces, rather than Defendants' illegal conspiracy. Defendants deceptively concealed
10 their unlawful activities by agreeing not to divulge the existence of the conspiracy, conducting
11 meetings and conversations in secret, confining the plan to a small group of high-level officials,
12 and avoiding the creation of documents.

13 564. Defendants engaged in deceptive and unconscionable conduct to secure
14 economic benefits from Illinois State Subclass members. Illinois State Subclass members were
15 not aware of Defendants' price-fixing conspiracy or that they were being unfairly and illegally
16 overcharged. There was a gross disparity of bargaining power between the parties with respect
17 to the price of Plasma-Derivative Protein Therapies. Defendants had the sole power to set that
18 price and Illinois State Subclass members had no power to negotiate. Defendants' fraudulent
19 actions, therefore, suppressed competition, which resulted in unconscionably higher prices for
20 purchasers and increased benefits for Defendants.

21 565. Illinois State Subclass members suffered an ascertainable loss of money or
22 property from the supracompetitive, artificially inflated prices.

23 566. Defendants' conduct is a substantial factor of the Illinois State Subclass' loss.
24 The loss was a direct and proximate result of Defendants' willful and deceptive conduct.
25 Illinois State Subclass members purchased Plasma-Derivative Protein Therapies at
26 supracompetitive, artificially inflated prices because they reasonably relied on the false pretense,
27 which Defendants created, that the price was a product of a free and fair market.

567. Defendants engaged in unfair methods of competition or unconscionable, unfair, or deceptive acts or practices in violation of 815 ILCS 505/1, *et seq.*, and Illinois State Subclass members, accordingly, seek damages and injunctive relief pursuant to 815 ILCS 505/10a.

E. Violation of the Kansas Consumer Protection Act, K.S.A. §§ 50-623 *et seq.*

568. As set forth herein, Defendants engaged in unfair methods of competition or unconscionable, unfair, or deceptive acts or practices in violation of the Kansas Consumer Protection Act, K.S.A. §§ 50-623, *et seq.* Defendants' unlawful conduct had the following effects: (1) the Plasma-Derivative Protein Therapies price competition and output were restrained, suppressed, and eliminated throughout Kansas; (2) the price of Plasma-Derivative Protein Therapies was raised, fixed, maintained, and stabilized at artificially high levels throughout Kansas; (3) Kansas State Subclass members were deprived of free and open competition; (4) Kansas State Subclass members relied on Defendants' false representation that the price of Plasma-Derivative Protein Therapies was a product of a free and fair market; and (5) Kansas State Subclass members paid supracompetitive, artificially inflated prices for Plasma-Derivative Protein Therapies.

569. Defendants knowingly and willfully engaged in deceptive and unconscionable conduct by creating and participating in a price-fixing conspiracy. Defendants knowingly misrepresented the quantities of Plasma-Derivative Protein Therapies and justifications for price increases. Defendants, also, knowingly failed to disclose material information and important facts regarding the cost of Plasma-Derivative Protein Therapies. Defendants knowingly misled Kansas State Subclass members by creating the illusion of competitive pricing controlled by market forces, rather than Defendants' illegal conspiracy. Defendants deceptively concealed their unlawful activities by agreeing not to divulge the existence of the conspiracy, conducting meetings and conversations in secret, confining the plan to a small group of high-level officials, and avoiding the creation of documents.

570. Defendants engaged in deceptive and unconscionable conduct to secure economic benefits from Kansas State Subclass members. Kansas State Subclass members were not aware of Defendants' price-fixing conspiracy or that they were being unfairly and illegally

1 overcharged. There was a gross disparity of bargaining power between the parties with respect
 2 to the price of Plasma-Derivative Protein Therapies. Defendants had the sole power to set that
 3 price and Kansas State Subclass members had no power to negotiate. Defendants' fraudulent
 4 actions, therefore, suppressed competition, which resulted in unconscionably higher prices for
 5 purchasers and increased benefits for Defendants.

6 571. Kansas State Subclass members suffered an ascertainable loss of money or
 7 property from the supracompetitive, artificially inflated prices.

8 572. Defendants' conduct is a substantial factor of the Kansas State Subclass' loss.
 9 The loss was a direct and proximate result of Defendants' willful and deceptive conduct.
 10 Kansas State Subclass members purchased Plasma-Derivative Protein Therapies at
 11 supracompetitive, artificially inflated prices because they reasonably relied on the false pretense,
 12 which Defendants created, that the price was a product of a free and fair market.

13 573. Defendants engaged in unfair methods of competition or unconscionable, unfair,
 14 or deceptive acts or practices in violation of the Kansas Consumer Protection Act, K.S.A. §§ 50-
 15 623 *et seq.*, and Kansas State Subclass members, accordingly, seek damages and injunctive
 16 relief pursuant to K.S.A. §§ 50-634.

17 **F. Violation of the Kentucky Consumer Protection Act, KRS §§ 367.110 *et seq.***

18 574. As set forth herein, Defendants engaged in unfair methods of competition or
 19 unconscionable, unfair, or deceptive acts or practices in violation of the Kentucky Consumer
 20 Protection Act, KRS §§ 367.110, *et seq.* Defendants' unlawful conduct had the following
 21 effects: (1) the Plasma-Derivative Protein Therapies price competition and output were
 22 restrained, suppressed, and eliminated throughout Kentucky; (2) the price of Plasma-Derivative
 23 Protein Therapies was raised, fixed, maintained, and stabilized at artificially high levels
 24 throughout Kentucky; (3) Kentucky State Subclass members were deprived of free and open
 25 competition; (4) Kentucky State Subclass members relied on Defendants' false representation
 26 that the price of Plasma-Derivative Protein Therapies was a product of a free and fair market;
 27 and (5) Kentucky State Subclass members paid supracompetitive, artificially inflated prices for
 28 Plasma-Derivative Protein Therapies.

1 575. Defendants knowingly and willfully engaged in deceptive and unconscionable
2 conduct by creating and participating in a price-fixing conspiracy. Defendants knowingly
3 misrepresented the quantities of Plasma-Derivative Protein Therapies and justifications for price
4 increases. Defendants, also, knowingly failed to disclose material information and important
5 facts regarding the cost of Plasma-Derivative Protein Therapies. Defendants knowingly misled
6 Kentucky State Subclass members by creating the illusion of competitive pricing controlled by
7 market forces, rather than Defendants' illegal conspiracy. Defendants deceptively concealed
8 their unlawful activities by agreeing not to divulge the existence of the conspiracy, conducting
9 meetings and conversations in secret, confining the plan to a small group of high-level officials,
10 and avoiding the creation of documents.

11 576. Defendants engaged in deceptive and unconscionable conduct to secure
12 economic benefits from Kentucky State Subclass members. Kentucky State Subclass members
13 were not aware of Defendants' price-fixing conspiracy or that they were being unfairly and
14 illegally overcharged. There was a gross disparity of bargaining power between the parties with
15 respect to the price of Plasma-Derivative Protein Therapies. Defendants had the sole power to
16 set that price and Kentucky State Subclass members had no power to negotiate. Defendants'
17 fraudulent actions, therefore, suppressed competition, which resulted in unconscionably higher
18 prices for purchasers and increased benefits for Defendants.

19 577. Kentucky State Subclass members suffered an ascertainable loss of money or
20 property from the supracompetitive, artificially inflated prices.

21 578. Defendants' conduct is a substantial factor of the Kentucky State Subclass' loss.
22 The loss was a direct and proximate result of Defendants' willful and deceptive conduct.
23 Kentucky State Subclass members purchased Plasma-Derivative Protein Therapies at
24 supracompetitive, artificially inflated prices because they reasonably relied on the false pretense,
25 which Defendants created, that the price was a product of a free and fair market.

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579. Defendants engaged in unfair methods of competition or unconscionable, unfair, or deceptive acts or practices in violation of the Kentucky Consumer Protection Act, KRS §§ 367.110 *et seq.*, and Kentucky State Subclass members, accordingly, seek damages and injunctive relief pursuant to KRS §§ 367.220.

G. Violation of the Maine Unfair Trade Practices and Consumer Protection Law, M.R.S.A. §§ 205A *et seq.*

580. As set forth herein, Defendants engaged in unfair methods of competition or unconscionable, unfair, or deceptive acts or practices in violation of the Maine Unfair Trade Practices and Consumer Protection Law, M.R.S.A. §§ 205A, *et seq.* Defendants' unlawful conduct had the following effects: (1) the Plasma-Derivative Protein Therapies price competition and output were restrained, suppressed, and eliminated throughout Maine; (2) the price of Plasma-Derivative Protein Therapies was raised, fixed, maintained, and stabilized at artificially high levels throughout Maine; (3) Maine State Subclass members were deprived of free and open competition; (4) Maine State Subclass members relied on Defendants' false representation that the price of Plasma-Derivative Protein Therapies was a product of a free and fair market; and (5) Maine State Subclass members paid supracompetitive, artificially inflated prices for Plasma-Derivative Protein Therapies.

581. Defendants knowingly and willfully engaged in deceptive and unconscionable conduct by creating and participating in a price-fixing conspiracy. Defendants knowingly misrepresented the quantities of Plasma-Derivative Protein Therapies and justifications for price increases. Defendants, also, knowingly failed to disclose material information and important facts regarding the cost of Plasma-Derivative Protein Therapies. Defendants knowingly misled Maine State Subclass members by creating the illusion of competitive pricing controlled by market forces, rather than Defendants' illegal conspiracy. Defendants deceptively concealed their unlawful activities by agreeing not to divulge the existence of the conspiracy, conducting meetings and conversations in secret, confining the plan to a small group of high-level officials, and avoiding the creation of documents.

582. Defendants engaged in deceptive and unconscionable conduct to secure economic benefits from Maine State Subclass members. Maine State Subclass members were not aware of Defendants' price-fixing conspiracy or that they were being unfairly and illegally overcharged. There was a gross disparity of bargaining power between the parties with respect to the price of Plasma-Derivative Protein Therapies. Defendants had the sole power to set that price and Maine State Subclass members had no power to negotiate. Defendants' fraudulent actions, therefore, suppressed competition, which resulted in unconscionably higher prices for purchasers and increased benefits for Defendants.

583. Maine State Subclass members suffered an ascertainable loss of money or property from the supracompetitive, artificially inflated prices.

584. Defendants' conduct is a substantial factor of the Maine State Subclass' loss. The loss was a direct and proximate result of Defendants' willful and deceptive conduct. Maine State Subclass members purchased Plasma-Derivative Protein Therapies at supracompetitive, artificially inflated prices because they reasonably relied on the false pretense, which Defendants created, that the price was a product of a free and fair market.

585. Defendants engaged in unfair methods of competition or unconscionable, unfair, or deceptive acts or practices in violation of the Maine Unfair Trade Practices and Consumer Protection Law, M.R.S.A. §§ 205A *et seq.*, and Maine State Subclass members, accordingly, seek damages and injunctive relief pursuant to M.R.S.A. §§ 213.

H. Violation of the Maryland Consumer Protection Act, MD Code Com. Law §§ 13-301 *et seq.*

586. As set forth herein, Defendants engaged in unfair methods of competition or unconscionable, unfair, or deceptive acts or practices in violation of the Maryland Consumer Protection Act, MD Code Com. Law §§ 13-301, *et seq.* Defendants' unlawful conduct had the following effects: (1) the Plasma-Derivative Protein Therapies price competition and output were restrained, suppressed, and eliminated throughout Maryland; (2) the price of Plasma-Derivative Protein Therapies was raised, fixed, maintained, and stabilized at artificially high levels throughout Maryland; (3) Maryland State Subclass members were deprived of free

1 and open competition; (4) Maryland State Subclass members relied on Defendants' false
2 representation that the price of Plasma-Derivative Protein Therapies was a product of a free and
3 fair market; and (5) Maryland State Subclass members paid supracompetitive, artificially
4 inflated prices for Plasma-Derivative Protein Therapies.

5 587. Defendants knowingly and willfully engaged in deceptive and unconscionable
6 conduct by creating and participating in a price-fixing conspiracy. Defendants knowingly
7 misrepresented the quantities of Plasma-Derivative Protein Therapies and justifications for price
8 increases. Defendants, also, knowingly failed to disclose material information and important
9 facts regarding the cost of Plasma-Derivative Protein Therapies. Defendants knowingly misled
10 Maryland State Subclass members by creating the illusion of competitive pricing controlled by
11 market forces, rather than Defendants' illegal conspiracy. Defendants deceptively concealed
12 their unlawful activities by agreeing not to divulge the existence of the conspiracy, conducting
13 meetings and conversations in secret, confining the plan to a small group of high-level officials,
14 and avoiding the creation of documents.

15 588. Defendants engaged in deceptive and unconscionable conduct to secure
16 economic benefits from Maryland State Subclass members. Maryland State Subclass members
17 were not aware of Defendants' price-fixing conspiracy or that they were being unfairly and
18 illegally overcharged. There was a gross disparity of bargaining power between the parties with
19 respect to the price of Plasma-Derivative Protein Therapies. Defendants had the sole power to
20 set that price and Maryland State Subclass members had no power to negotiate. Defendants'
21 fraudulent actions, therefore, suppressed competition, which resulted in unconscionably higher
22 prices for purchasers and increased benefits for Defendants.

23 589. Maryland State Subclass members suffered an ascertainable loss of money or
24 property from the supracompetitive, artificially inflated prices.

25 590. Defendants' conduct is a substantial factor of the Maryland State Subclass' loss.
26 The loss was a direct and proximate result of Defendants' willful and deceptive conduct.
27 Maryland State Subclass members purchased Plasma-Derivative Protein Therapies at
28

1 supracompetitive, artificially inflated prices because they reasonably relied on the false pretense,
2 which Defendants created, that the price was a product of a free and fair market.

3 591. Defendants engaged in unfair methods of competition or unconscionable, unfair,
4 or deceptive acts or practices in violation of the Maryland Consumer Protection Act, Md.Code
5 Com. Law §§ 13-301 *et seq.*, and Maryland State Subclass members, accordingly, seek damages
6 pursuant to MD Code Com. Law § 13-408 and injunctive relief pursuant to MD Code Com.
7 Law § 13-407.

8 **I. Violation of Massachusetts Law, M.G.L.A. 93A §§ 1 *et seq.***

9 592. As set forth herein, Defendants engaged in unfair methods of competition or
10 unconscionable, unfair, or deceptive acts or practices in violation of M.G.L.A. 93A §§ 1 *et seq.*
11 Defendants' unlawful conduct had the following effects: (1) the Plasma-Derivative Protein
12 Therapies price competition and output were restrained, suppressed, and eliminated throughout
13 Massachusetts; (2) the price of Plasma-Derivative Protein Therapies was raised, fixed,
14 maintained, and stabilized at artificially high levels throughout Massachusetts; (3)
15 Massachusetts State Subclass members were deprived of free and open competition; (4)
16 Massachusetts State Subclass members relied on Defendants' false representation that the price
17 of Plasma-Derivative Protein Therapies was a product of a free and fair market; and (5)
18 Massachusetts State Subclass members paid supracompetitive, artificially inflated prices for
19 Plasma-Derivative Protein Therapies.

20 593. Defendants knowingly and willfully engaged in deceptive and unconscionable
21 conduct by creating and participating in a price-fixing conspiracy. Defendants knowingly
22 misrepresented the quantities of Plasma-Derivative Protein Therapies and justifications for price
23 increases. Defendants, also, knowingly failed to disclose material information and important
24 facts regarding the cost of Plasma-Derivative Protein Therapies. Defendants knowingly misled
25 Massachusetts State Subclass members by creating the illusion of competitive pricing controlled
26 by market forces, rather than Defendants' illegal conspiracy. Defendants deceptively concealed
27 their unlawful activities by agreeing not to divulge the existence of the conspiracy, conducting
28

1 meetings and conversations in secret, confining the plan to a small group of high-level officials,
2 and avoiding the creation of documents.

3 594. Defendants engaged in deceptive and unconscionable conduct to secure
4 economic benefits from Massachusetts State Subclass members. Massachusetts State Subclass
5 members were not aware of Defendants' price-fixing conspiracy or that they were being
6 unfairly and illegally overcharged. There was a gross disparity of bargaining power between the
7 parties with respect to the price of Plasma-Derivative Protein Therapies. Defendants had the
8 sole power to set that price and Massachusetts State Subclass members had no power to
9 negotiate. Defendants' fraudulent actions, therefore, suppressed competition, which resulted in
10 unconscionably higher prices for purchasers and increased benefits for Defendants.

11 595. Massachusetts State Subclass members suffered an ascertainable loss of money
12 or property from the supracompetitive, artificially inflated prices.

13 596. Defendants' conduct is a substantial factor of the Massachusetts State Subclass'
14 loss. The loss was a direct and proximate result of Defendants' willful and deceptive conduct.
15 Massachusetts State Subclass members purchased Plasma-Derivative Protein Therapies at
16 supracompetitive, artificially inflated prices because they reasonably relied on the false pretense,
17 which Defendants created, that the price was a product of a free and fair market.

18 597. Defendants engaged in unfair methods of competition or unconscionable, unfair,
19 or deceptive acts or practices in violation of M.G.L.A. 93A §§ 1 *et seq.*, and Massachusetts
20 State Subclass members, accordingly, seek damages and injunctive relief pursuant to M.G.L.A.
21 93A § 9.

22 **J. Violation of the Michigan Consumer Protection Act, Mich. Comp. Laws Ann. §§**
23 **445.901 et seq.**

24 598. As set forth herein, Defendants engaged in unfair methods of competition or
25 unconscionable, unfair, or deceptive acts or practices in violation of the Michigan Consumer
26 Protection Act, Mich. Comp. Laws Ann. §§ 445.901 *et seq.* Defendants' unlawful conduct had
27 the following effects: (1) the Plasma-Derivative Protein Therapies price competition and output
28 were restrained, suppressed, and eliminated throughout Michigan; (2) the price of

1 Plasma-Derivative Protein Therapies was raised, fixed, maintained, and stabilized at artificially
2 high levels throughout Michigan; (3) Michigan State Subclass members were deprived of free
3 and open competition; (4) Michigan State Subclass members relied on Defendants' false
4 representation that the price of Plasma-Derivative Protein Therapies was a product of a free and
5 fair market; and (5) Michigan State Subclass members paid supracompetitive, artificially
6 inflated prices for Plasma-Derivative Protein Therapies.

7 599. Defendants knowingly and willfully engaged in deceptive and unconscionable
8 conduct by creating and participating in a price-fixing conspiracy. Defendants knowingly
9 misrepresented the quantities of Plasma-Derivative Protein Therapies and justifications for price
10 increases. Defendants, also, knowingly failed to disclose material information and important
11 facts regarding the cost of Plasma-Derivative Protein Therapies. Defendants knowingly misled
12 Michigan State Subclass members by creating the illusion of competitive pricing controlled by
13 market forces, rather than Defendants' illegal conspiracy. Defendants deceptively concealed
14 their unlawful activities by agreeing not to divulge the existence of the conspiracy, conducting
15 meetings and conversations in secret, confining the plan to a small group of high-level officials,
16 and avoiding the creation of documents.

17 600. Defendants engaged in deceptive and unconscionable conduct to secure
18 economic benefits from Michigan State Subclass members. Michigan State Subclass members
19 were not aware of Defendants' price-fixing conspiracy or that they were being unfairly and
20 illegally overcharged. There was a gross disparity of bargaining power between the parties with
21 respect to the price of Plasma-Derivative Protein Therapies. Defendants had the sole power to
22 set that price and Michigan State Subclass members had no power to negotiate. Defendants'
23 fraudulent actions, therefore, suppressed competition, which resulted in unconscionably higher
24 prices for purchasers and increased benefits for Defendants.

25 601. Michigan State Subclass members suffered an ascertainable loss of money or
26 property from the supracompetitive, artificially inflated prices.

602. Defendants' conduct a substantial factor of the Michigan State Subclass' loss. The loss was a direct and proximate result of Defendants' willful and deceptive conduct. Michigan State Subclass members purchased Plasma-Derivative Protein Therapies at supracompetitive, artificially inflated prices because they reasonably relied on the false pretense, which Defendants created, that the price was a product of a free and fair market.

603. Defendants engaged in unfair methods of competition or unconscionable, unfair, or deceptive acts or practices in violation of the Michigan Consumer Protection Act, Mich. Comp. Laws Ann. §§ 445.901 *et seq.*, and Michigan State Subclass members, accordingly, seek damages and injunctive relief pursuant to Mich. Comp. Laws Ann. § 445.911.

K. Violation of the Nebraska Consumer Protection Act, Neb. Rev. St. §§ 59-1601 *et seq.*

604. As set forth herein, Defendants engaged in unfair methods of competition or unconscionable, unfair, or deceptive acts or practices in violation of the Nebraska Consumer Protection Act, Neb. Rev. St. §§ 59-1601 *et seq.* Defendants' unlawful conduct had the following effects: (1) the Plasma-Derivative Protein Therapies price competition and output were restrained, suppressed, and eliminated throughout Nebraska; (2) the price of Plasma-Derivative Protein Therapies was raised, fixed, maintained, and stabilized at artificially high levels throughout Nebraska; (3) Nebraska State Subclass members were deprived of free and open competition; (4) Nebraska State Subclass members relied on Defendants' false representation that the price of Plasma-Derivative Protein Therapies was a product of a free and fair market; and (5) Nebraska State Subclass members paid supracompetitive, artificially inflated prices for Plasma-Derivative Protein Therapies.

605. Defendants knowingly and willfully engaged in deceptive and unconscionable conduct by creating and participating in a price-fixing conspiracy. Defendants knowingly misrepresented the quantities of Plasma-Derivative Protein Therapies and justifications for price increases. Defendants, also, knowingly failed to disclose material information and important facts regarding the cost of Plasma-Derivative Protein Therapies. Defendants knowingly misled Nebraska State Subclass members by creating the illusion of competitive pricing controlled by

1 market forces, rather than Defendants' illegal conspiracy. Defendants deceptively concealed
2 their unlawful activities by agreeing not to divulge the existence of the conspiracy, conducting
3 meetings and conversations in secret, confining the plan to a small group of high-level officials,
4 and avoiding the creation of documents.

5 606. Defendants engaged in deceptive and unconscionable conduct to secure
6 economic benefits from Nebraska State Subclass members. Nebraska State Subclass members
7 were not aware of Defendants' price-fixing conspiracy or that they were being unfairly and
8 illegally overcharged. There was a gross disparity of bargaining power between the parties with
9 respect to the price of Plasma-Derivative Protein Therapies. Defendants had the sole power to
10 set that price and Nebraska State Subclass members had no power to negotiate. Defendants'
11 fraudulent actions, therefore, suppressed competition, which resulted in unconscionably higher
12 prices for purchasers and increased benefits for Defendants.

13 607. Nebraska State Subclass members suffered an ascertainable loss of money or
14 property from the supracompetitive, artificially inflated prices.

15 608. Defendants' conduct is a substantial factor of the Nebraska State Subclass' loss.
16 The loss was a direct and proximate result of Defendants' willful and deceptive conduct.
17 Nebraska State Subclass members purchased Plasma-Derivative Protein Therapies at
18 supracompetitive, artificially inflated prices because they reasonably relied on the false pretense,
19 which Defendants created, that the price was a product of a free and fair market.

20 609. Defendants engaged in unfair methods of competition or unconscionable, unfair,
21 or deceptive acts or practices in violation of the Nebraska Consumer Protection Act, Neb. Rev.
22 St. §§ 59-1601 *et seq.*, and Nebraska State Subclass members, accordingly, seek damages and
23 injunctive relief pursuant to Neb. Rev. St. §§ 59-1609.

24 **L. Violation of the New Mexico Unfair Practices Act, N.M. Stat. Ann. §§ 57-12-1 et**
25 **seq.**

26 610. As set forth herein, Defendants engaged in unfair methods of competition or
27 unconscionable, unfair, or deceptive acts or practices in violation of the New Mexico Unfair
28 Practices Act, N.M. Stat. Ann. §§ 57-12-1 *et seq.* Defendants' unlawful conduct had the

1 following effects: (1) the Plasma-Derivative Protein Therapies price competition and output
 2 were restrained, suppressed, and eliminated throughout New Mexico; (2) the price of
 3 Plasma-Derivative Protein Therapies was raised, fixed, maintained, and stabilized at artificially
 4 high levels throughout New Mexico; (3) New Mexico State Subclass members were deprived of
 5 free and open competition; (4) New Mexico State Subclass members relied on Defendants' false
 6 representation that the price of Plasma-Derivative Protein Therapies was a product of a free and
 7 fair market; and (5) New Mexico State Subclass members paid supracompetitive, artificially
 8 inflated prices for Plasma-Derivative Protein Therapies.

9 611. Defendants knowingly and willfully engaged in deceptive and unconscionable
 10 conduct by creating a monopoly in a price-fixing conspiracy. Defendants knowingly
 11 misrepresented the quantities of Plasma-Derivative Protein Therapies and justifications for price
 12 increases. Defendants, also, knowingly failed to disclose material information and important
 13 facts regarding the cost of Plasma-Derivative Protein Therapies. Defendants knowingly misled
 14 New Mexico State Subclass members by creating the illusion of competitive pricing controlled
 15 by market forces, rather than Defendants' illegal conspiracy. Defendants deceptively concealed
 16 their unlawful activities by agreeing not to divulge the existence of the conspiracy, conducting
 17 meetings and conversations in secret, confining the plan to a small group of high-level officials,
 18 and avoiding the creation of documents.

19 612. Defendants engaged in deceptive and unconscionable conduct to secure
 20 economic benefits from New Mexico State Subclass members. New Mexico State Subclass
 21 members were not aware of Defendants' price-fixing conspiracy or that they were being unfairly
 22 and illegally overcharged. There was a gross disparity of bargaining power between the parties
 23 with respect to the price of Plasma-Derivative Protein Therapies. Defendants had the sole
 24 power to set that price and New Mexico State Subclass members had no power to negotiate.
 25 Defendants' fraudulent actions, therefore, suppressed competition, which resulted in
 26 unconscionably higher prices for purchasers and increased benefits for Defendants.

27 613. New Mexico State Subclass members suffered an ascertainable loss of money or
 28 property from the supracompetitive, artificially inflated prices.

614. Defendants' conduct is a substantial factor of the New Mexico State Subclass' loss. The loss was a direct and proximate result of Defendants' willful and deceptive conduct. New Mexico State Subclass members purchased Plasma-Derivative Protein Therapies at supracompetitive, artificially inflated prices because they reasonably relied on the false pretense, which Defendants created; that the price was a product of a free and fair market.

615. Defendants engaged in unfair methods of competition or unconscionable, unfair, or deceptive acts or practices in violation of the New Mexico Unfair Practices Act, N.M. Stat. Ann. §§ 57-12-1 *et seq.*, and New Mexico State Subclass members, accordingly, seek damages and injunctive relief pursuant to N.M. Stat. Ann. § 57-12-10.

M. Violation of New York Law, N.Y. Gen. Bus. Law §§ 349 *et seq.*

616. As set forth herein, Defendants engaged in unfair methods of competition or unconscionable, unfair, or deceptive acts or practices in violation of N.Y. Gen. Bus. Law §§ 349 *et seq.* Defendants' unlawful conduct had the following effects: (1) the Plasma-Derivative Protein Therapies price competition and output were restrained, suppressed, and eliminated throughout New York; (2) the price of Plasma-Derivative Protein Therapies was raised, fixed, maintained, and stabilized at artificially high levels throughout New York; (3) New York State Subclass members were deprived of free and open competition; (4) New York State Subclass members relied on Defendants' false representation that the price of Plasma-Derivative Protein Therapies was a product of a free and fair market; and (5) New York State Subclass members paid supracompetitive, artificially inflated prices for Plasma-Derivative Protein Therapies.

617. Defendants knowingly and willfully engaged in deceptive and unconscionable conduct by creating and participating in a price-fixing conspiracy. Defendants knowingly misrepresented the quantities of Plasma-Derivative Protein Therapies and justifications for price increases. Defendants, also, knowingly failed to disclose material information and important facts regarding the cost of Plasma-Derivative Protein Therapies. Defendants knowingly misled New York State Subclass members by creating the illusion of competitive pricing controlled by market forces, rather than Defendants' illegal conspiracy. Defendants deceptively concealed their unlawful activities by agreeing not to divulge the existence of the conspiracy, conducting

1 meetings and conversations in secret, confining the plan to a small group of high-level officials,
2 and avoiding the creation of documents.

3 618. Defendants engaged in deceptive and unconscionable conduct to secure
4 economic benefits from New York State Subclass members. New York State Subclass
5 members were not aware of Defendants' price-fixing conspiracy or that they were being unfairly
6 and illegally overcharged. There was a gross disparity of bargaining power between the parties
7 with respect to the price of Plasma-Derivative Protein Therapies. Defendants had the sole
8 power to set that price and New York State Subclass members had no power to negotiate.
9 Defendants' fraudulent actions, therefore, suppressed competition, which resulted in
10 unconscionably higher prices for purchasers and increased benefits for Defendants.

11 619. New York State Subclass members suffered an ascertainable loss of money or
12 property from the supracompetitive, artificially inflated prices.

13 620. Defendants' conduct is a substantial factor of the New York State Subclass' loss.
14 The loss was a direct and proximate result of Defendants' willful and deceptive conduct. New
15 York State Subclass members purchased Plasma-Derivative Protein Therapies at
16 supracompetitive, artificially inflated prices because they reasonably relied on the false pretense,
17 which Defendants created, that the price was a product of a free and fair market.

18 621. Defendants engaged in unfair methods of competition or unconscionable, unfair,
19 or deceptive acts or practices in violation of N.Y. Gen. Bus. Law §§ 349 *et seq.*, and New York
20 State Subclass members, accordingly, seek damages and injunctive relief pursuant to N.Y. Gen.
21 Bus. Law § 349.

22 **N. Violation of Utah Law, U.C.A. 1953 §§ 13-5-1 *et seq.***

23 622. As set forth herein, Defendants engaged in unfair methods of competition or
24 unconscionable, unfair, or deceptive acts or practices in violation of U.C.A. 1953 §§ 13-5-1 *et*
25 *seq.* Defendants' unlawful conduct had the following effects: (1) the Plasma-Derivative Protein
26 Therapies price competition and output were restrained, suppressed, and eliminated throughout
27 Utah; (2) the price of Plasma-Derivative Protein Therapies was raised, fixed, maintained, and
28 stabilized at artificially high levels throughout Utah; (3) Utah State Subclass members were

1 deprived of free and open competition; (4) Utah State Subclass members relied on Defendants'
2 false representation that the price of Plasma-Derivative Protein Therapies was a product of a
3 free and fair market; and (5) Utah State Subclass members paid supracompetitive, artificially
4 inflated prices for Plasma-Derivative Protein Therapies.

5 623. Defendants knowingly and willfully engaged in deceptive and unconscionable
6 conduct by creating and participating in a price-fixing conspiracy. Defendants knowingly
7 misrepresented the quantities of Plasma-Derivative Protein Therapies and justifications for price
8 increases. Defendants, also, knowingly failed to disclose material information and important
9 facts regarding the cost of Plasma-Derivative Protein Therapies. Defendants knowingly misled
10 Utah State Subclass members by creating the illusion of competitive pricing controlled by
11 market forces, rather than Defendants' illegal conspiracy. Defendants deceptively concealed
12 their unlawful activities by agreeing not to divulge the existence of the conspiracy, conducting
13 meetings and conversations in secret, confining the plan to a small group of high-level officials,
14 and avoiding the creation of documents.

15 624. Defendants engaged in deceptive and unconscionable conduct to secure
16 economic benefits from Utah State Subclass members. Utah State Subclass members were not
17 aware of Defendants' price-fixing conspiracy or that they were being unfairly and illegally
18 overcharged. There was a gross disparity of bargaining power between the parties with respect
19 to the price of Plasma-Derivative Protein Therapies. Defendants had the sole power to set that
20 price and Utah State Subclass members had no power to negotiate. Defendants' fraudulent
21 actions, therefore, suppressed competition, which resulted in unconscionably higher prices for
22 purchasers and increased benefits for Defendants.

23 625. Utah State Subclass members suffered an ascertainable loss of money or property
24 from the supracompetitive, artificially inflated prices.

25 626. Defendants' conduct is a substantial factor of the Utah State Subclass' loss. The
26 loss was a direct and proximate result of Defendants' willful and deceptive conduct. Utah State
27 Subclass members purchased Plasma-Derivative Protein Therapies at supracompetitive,
28

1 artificially inflated prices because they reasonably relied on the false pretense, which Defendants
2 created, that the price was a product of a free and fair market.

3 627. Defendants engaged in unfair methods of competition or unconscionable, unfair,
4 or deceptive acts or practices in violation of U.C.A. 1953 §§ 13-5-1 *et seq.*, and Utah State
5 Subclass members, accordingly, seek damages and injunctive relief pursuant to U.C.A. 1953 §
6 13-5-14.

7 **PRAYER FOR RELIEF**

8 WHEREFORE, Plaintiff prays as follows:

- 9 A. That the Court determine that this action may be maintained as a class action
10 under Rule 23(a) and (b)(3) of the Federal Rules of Civil Procedure.
- 11 B. That the contract, combination or conspiracy, and the acts done in furtherance
12 thereof by Defendants and their co-conspirators be adjudged to have violated the
13 Antitrust and Unfair Competition Laws
- 14 C. That judgment be entered for Plaintiff and Class members against Defendants for
15 damages sustained by Plaintiff and the Class and/or restitution as allowed by law.
- 16 D. That Plaintiff and the Class recover pre-judgment and post-judgment interest as
17 permitted by law.
- 18 E. That Plaintiff and the Class recover their costs of the suit, including attorneys'
19 fees, as provided by law.
- 20 F. That Defendants be enjoined from continuing their participation in the alleged
21 conspiracy.
- 22 G. For such other and further relief as is just and proper under the circumstances.

23
24 DATED: December 14, 2010

COTCHETT, PITRE & McCARTHY

25
26 By 

27 Stuart G. Gross
Attorneys for Plaintiff County of San Mateo
and Putative Class

JURY DEMAND

Plaintiff demands a jury trial on all issues so triable.

DATED: Decemeber 14, 2010

COTCHETT, PITRE & McCARTHY

By: 

Stuart G. Gross

*Attorneys for Plaintiff County of San Mateo
and Putative Class*